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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR REPLY IN
SUPPORT OF THEIR MOTION FOR
RELIEF FROM AND EMERGENCY
MOTION FOR STAY OF NON-
DISPOSITIVE PRETRIAL ORDER OF
MAGISTRATE JUDGE (DKT. 951)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Administrative Motion to File Under
7 Seal Portions of Their Reply in Support of Their Motion for Relief from and Emergency Motion for
8 Stay of Non-Dispositive Pretrial Order of Magistrate Judge (Dkt. 951) (the "Administrative Motion").
9 The Administrative Motion seeks an order sealing highlighted portions of Defendants' Reply in
10 Support of Motion for Relief from and Emergency Motion for Stay ("Uber's Reply").

11 3. The portions of Uber's Reply marked in red boxes contain or reference trade secret and
12 confidential business information, which Waymo seeks to seal.

13 4. Uber's Motion (portions in red boxes in version filed herewith) contain, reference,
14 and/or describe Waymo's asserted trade secrets. The information Waymo seeks to seal includes the
15 confidential design and functionality of Waymo's proprietary autonomous vehicle system, which
16 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
17 (Dkt. 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). The public
18 disclosure of this information would give Waymo's competitors access to descriptions of the
19 functionality or features of Waymo's autonomous vehicle system. If such information were made
20 public, I understand that Waymo's competitive standing would be significantly harmed.

21 5. Waymo's request to seal is narrowly tailored to those portions of Uber's Reply that
22 merit sealing.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States of America that the foregoing is true and correct, and that this declaration was executed in San
25 Francisco, California, on August 1, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
28 Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven